

REMARKS

Claims 1-14 and 16-22 are now presented for examination. Claims 1, 3, 5, 11, 13, 14, 16 and 20 have been amended. Claim 15 has been canceled without prejudice and without disclaimer of subject matter. New Claims 21 and 22 have been added. No new matter has been added.

As an initial matter, Applicant thanks the Examiner for the indication in paragraph 3 of the Office Action that Claims 14-15 and 19-20 are allowable if rewritten in independent form, including the limitations of their respective base independent and any intervening claims. Allowable Claim 19 has been rewritten as new Claim 22 and allowable Claim 20 has been amended to depend from new Claim 22. The “analyzing” feature of Claim 15 has been rewritten into base independent Claim 11.

Claims 1, 5, 11 and 16 and 22 are independent.

On page 2 of the Office Action, Claims 1-13 and 16-18 are rejected under 35 U.S.C. §103(a) as being unpatentable over McManus, *et al.*, (US 2003/0102956) (hereinafter “McManus”) in view of Corless (US 5,514,857) (hereinafter “Corless”). Applicant asserts that the claims, as presently presented, are patentable over McManus and Corless.

Independent Claims 1, 5, 11 and 16 have been amended to incorporate features not disclosed, taught or even suggested in the cited references, whether considered alone or in combination. Claim 1 as now presented and its corresponding dependent claims include the feature of “analyzing said second set of people count data and said first set of people count data using one of said first people counting data collection unit and said second people counting data collection unit.” Page 13 of the Office Action suggests that the analyzing feature, which was originally presented in allowable Claim 14, is not disclosed, taught or even suggested in either McManus or Corless. Applicants therefore respectfully assert that Claim 1 is patentable, and request the withdrawal of the rejection of this claim.

Independent Claim 5, as amended, and its corresponding dependent claims, include the feature of “a display screen coupled to at least one of said first people counting data collection unit and said second people counting data collection unit for displaying people counting data

corresponding to at least one of said first people counting data collection unit and said second people counting data collection unit” Neither McManus nor Corless discloses, teaches or even suggests a people counting data collection unit coupled to a display screen or that any such display screen is used to display people counting data. Further, neither McManus nor Corless suggest that one local device can be used to display data corresponding to another device. For at least this reason, Applicants believe that amended Claim 5 is in condition for allowance and request that the rejection of this claim be withdrawn.

Independent Claim 11 as amended and its corresponding dependent claims, include “analyzing said second set of people count data and a first set of people count data from said first people counting data collection unit.” As noted above, page 13 of the Office Action suggests that the analyzing feature, which was originally presented in allowable Claim 14, is not disclosed, taught or even suggested in either McManus or Corless.

A feature of independent Claim 16 as amended, and its corresponding dependent claims, includes “a display screen displaying people counting data.” As noted above with respect to independent Claim 5, neither McManus nor Corless discloses, teaches or suggests a people counting data collection coupled to a video screen. Applicants therefore believe that Claim 16 is in condition for allowance and respectfully request that the rejection of this claim be withdrawn.

Newly added Claim 21 recites “displaying said second set of people count data and said first set of people count data features on the display screen.” In addition to being patentable by virtue of its indirect dependency on allowable Claim 22, the feature recited in Claim 21 is not taught or suggested by McManus or Corless.

The dependent Claims 2-4, 6-10, 12-14 and 17-21 depend either directly or indirectly from one or another of independent Claims 1, 5, 11, 16 and 22. These claims recite additional limitations, which, in conformity with the features of their corresponding independent claim, are not disclosed or suggested by the art of record. The dependent claims are therefore believed patentable. However, the individual reconsideration of the patentability of each claim on its own merits is respectfully requested.

For all of the above reasons, the claim rejections are believed to have been overcome placing Claims 1-14 and 16-22 in condition for allowance, and reconsideration and allowance thereof is respectfully requested.

Of note, Applicant's undersigned representative is registered to practice before the United States Patent & Trademark Office. In accordance with 37 C.F.R. § 1.34 and M.P.E.P. § 405, the signature of Applicant's undersigned representative is representation that he is authorized to represent Applicant and the assignee on whose behalf he is acting.

The Examiner is encouraged to telephone the undersigned to discuss any matter that would expedite allowance of the present application.

Respectfully submitted,



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Alan M. Weisberg, Esq.
Reg. No.: 43,982
Attorney for Applicant
CHRISTOPHER & WEISBERG, P.A.
200 East Las Olas Boulevard, Suite 2040
Fort Lauderdale, Florida 33301
Tel: (954) 828-1488
Fax: (954) 838-9122
Customer No. 31292

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